

July 25, 2018

Via ECF

The Honorable Jesse M. Furman,
United States District Judge,
United States District Court for the Southern District of New York,
40 Foley Square,
New York, New York 10007.

Re: *Pirnik et al. v. Fiat Chrysler Automobiles N.V., et al.*,
No. 15 Civ. 7199 (JMF)

Dear Judge Furman:

On behalf of the parties in the above-referenced action, we write in response to Your Honor's July 18, 2018 Order (ECF No. 235) to provide an update on the parties' efforts to schedule the deposition of Plaintiffs' final fact witness, who had been Sergio Marchionne (until recently, FCA's Chief Executive Officer).

As has been widely reported over the past few days, Mr. Marchionne recently suffered unexpected complications while recovering from surgery. These complications worsened significantly in the past week, and this morning, Mr. Marchionne passed away. The parties are currently discussing alternative options with respect to Plaintiffs' final fact witness deposition. Given these recent events, the parties request an additional week (*i.e.*, to August 1) to reach resolution on this matter and then report back to the Court.

Respectfully submitted,

/s/ Michael J. Wernke
Michael J. Wernke
Pomerantz LLP
600 Third Avenue, 20th Floor
New York, New York 10016
(212) 661-1100
mjwernke@pomlaw.com

Counsel for Plaintiffs

Respectfully submitted,

/s/ William B. Monahan
William B. Monahan
Sullivan & Cromwell LLP
125 Broad Street
New York, New York 10004
(212) 558-4000
monahanw@sullcrom.com

Counsel for Defendants